

### **REMARKS**

Claims 6-15 are pending in this application. Claims 6 and 14-15 are independent. In light of the amendments and remarks made herein, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections.

By this amendment, Applicant has amended the claims to more appropriately recite the present invention. It is respectfully submitted that these amendments are being made without conceding the propriety of the Examiner's rejections, but merely to timely advance prosecution of the present application.

The Examiner rejected claims 6, 7, 9, and 13-15 under 35 U.S.C. § 103(a) as being unpatentable over Sasson (USP 5,016,107) in view of Wakui (USP 5,648,816); and rejected claims 8, 10, 11, and 12 under 35 U.S.C. § 103(a) as being unpatentable over Sasson and Wakui in view of Watanabe (USP 4,887,161). Applicant respectfully traverses these rejections.

#### **Claim Rejections - 35 U.S.C. § 103 - Sasson/Wakui**

By this amendment, Applicant has amended claim 6 to recite a digital camera for capturing images, comprising: a built-in, non-volatile memory for storing a plurality of images in the form of image data, said built-in, non-volatile memory being provided in a camera body; a detachable memory card for storing image data, said detachable memory card having a larger storage capacity than said built-in, non-volatile memory; an insertion slot for receiving said detachable memory card; detecting means for detecting insertion of said detachable memory card into said insertion slot; and memory control means for automatically transferring the image data from said built-in, non-volatile memory to said detachable memory card upon said detecting means detecting said insertion.

In support of her rejection of claim 6, the Examiner relies on the combination of the teachings of Sasson and Wakui to render the claim obvious. Specifically, with regard to Sasson, the Examiner asserts that Sasson discloses image buffer memory 18. Applicant respectfully

submits that the image buffer memory 18 is insufficient to teach or suggest the built-in, non-volatile memory as claimed.

The disclosure of Sasson is directed to an electronic still camera utilizing image compression and digital storage. Sasson identifies a problem in conventional cameras as the available techniques for capturing and processing images fail to meet the requirement for real time processing as needed by an electronic still camera. Sasson seeks to solve this problem by distinguishing the input function of the camera from the processing function so that, on the one hand, image signals from a plurality of still images accumulate at a rate commensurate with normal operation of the camera while, on the other hand, the accumulated image signals are digitally processed at a throughput rate different than the accumulating rate. In doing so, Sasson teaches an image buffer 18 that is fast, volatile memory. By providing a multi-image input buffer and separating digital processing from input requirements, the digital processor not only has more time to operate on blocks of image signals, in particular transform encoding the blocks of signals, but also obtains such processing advantages without disturbing the "stacking up" of images in the input buffer.

However, claim 6, as amended, clearly recites built-in, non-volatile memory that stores a plurality of images. Applicant maintains that Sasson fails to teach or suggest built-in, non-volatile memory as claimed. Further, there is no disclosure in Sasson that is directed to a memory control means for automatically transferring the image data from said built-in, non-volatile memory to said detachable memory card upon said detecting means detecting said insertion.

The Examiner additionally relies on the image buffer 7 of Wakui to teach built-in memory. However, the disclosure of Wakui is directed to a still video camera including detachably attachable external memory. Again, the image buffer 7 as disclosed in Wakui is directed to volatile memory. Thus, Applicant maintains that Wakui fails to teach or suggest built-in, non-volatile memory as claimed. Further, there is no disclosure in Wakui that is directed to a memory control means for automatically transferring the image data from said built-in, non-

volatile memory to said detachable memory card upon said detecting means detecting said insertion.

As neither of the cited references teach or suggest built-in volatile memory, and a memory control means for automatically transferring the image data from said built-in, non-volatile memory to said detachable memory card upon said detecting means detecting said insertion, Applicant respectfully submits that claim 6 is patentable over the references as cited. It is respectfully submitted that the outstanding rejection be withdrawn.

It is respectfully submitted that dependent claims 7-13 are allowable for the reasons set forth above with regard to claim 6 at least based upon their dependency on claim 6. It is further respectfully submitted that claims 14-15 contain elements similar to those discussed above with regard to claim 6 and, thus, claims 14-15 are allowable for at least the reasons set forth above with regard to claim 6.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

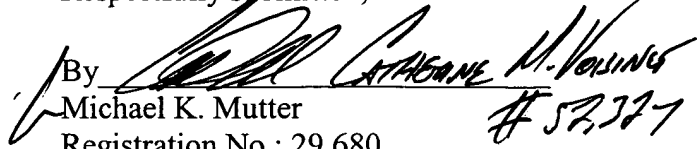
### **Conclusion**

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Catherine M. Voisin Reg. No. 52,327 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.14; particularly, extension of time fees.

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Respectfully submitted,

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